

### REMARKS/ARGUMENTS

The Applicants respectfully request reconsideration of this Application. The Applicants originally submitted Claims 1-17 in the Application. Previously, the Applicants amended Claims 1, 7, 12, 13 and 16, and canceled Claim 17 without prejudice or disclaimer. Presently, no claims have been amended, canceled nor added. Accordingly, Claims 1-16 are currently pending in the Application.

#### **I. Rejection of Claims 1-12 under 35 U.S.C. §102**

The Examiner has rejected Claims 1-12 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,440,770 B1 to Banjeree, et al. (Banjeree). Presently, independent Claim 1 includes the element that first and second regions of a conductive layer are exposed by a cavity formed within a second dielectric layer located thereover, and that the first region is insulated from the second region by a third dielectric layer. Among many others, Banjeree fails to disclose this element.

Banjeree is directed to an integrated circuit package. The package of Banjeree includes a substrate that has a first internal conductive bus and a second internal conductive bus that are located on a common layer of the substrate and dedicated to different power voltage levels. The busses are coupled to external lands located on a first surface of the package by vias that extend through the substrate. Banjeree does not, however, disclose that its first internal conductive bus and second internal conductive buses (i.e., the supposed first and second regions of the conductive layer of the claimed invention) are exposed by a cavity formed within a second dielectric layer located thereover. The only cavity of Banjeree is located at an end of the first internal conductive bus distal the second internal conductive bus. For this reason, the cavity does not expose both the first and second regions

of the conductive layer, but only exposes one end of the first internal conductive bus. Therefore, Banjeree fails to disclose this aforementioned element.

Additionally, regardless of the specific meaning the Examiner places upon the numerous layers of Banjeree, it fails to disclose at least one element of independent Claims 1 and 7. For example, the Examiner might indicate that the first internal conductive bus is 46 and the second conductive bus is 44, and that the cavity exposes both these layers. The Applicants do not believe this is an accurate reading of the Banjeree reference, however, the independent Claims of the present invention require the first and second regions be of the same conductive layer, and not two different layers, and therefore Banjeree fails to disclose this element. In effect, as a result of the unique interplay between the various layers and locations of those layers in the present invention, no consistent reading of the Banjeree reference could ever disclose each element currently recited in independent Claims 1 and 7.

Therefore, Banjeree does not disclose each and every element of the claimed invention and as such, is not an anticipating reference. Because Claims 2-6 and 8-12 are dependent upon Claims 1 and 7, Banjeree also cannot be an anticipating reference for Claims 2-6 and 8-12. Accordingly, the Applicants respectfully requests the Examiner to withdraw the §102 rejection with respect to these Claims.

## II. Allowable Subject Matter

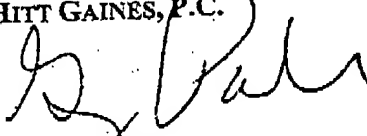
The Examiner has indicated that Claims 13-16 are allowed as written. The Applicants appreciate the Examiner's acknowledgment that Claims 13-16 contain allowable subject matter, and look forward to receiving a similar indication regarding Claims 1-12.

### III. Conclusion

In view of the foregoing remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-16.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application.

Respectfully submitted,  
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